

Exhibit 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION REGARDING THE FOURTH JOINT MOTION OF THE DEBTORS
AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
AN ORDER AUTHORIZING THE MOVANTS TO REDACT OR
WITHHOLD CERTAIN CONFIDENTIAL INFORMATION OF CUSTOMERS**

This stipulation (“Stipulation”) is being entered into between FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors appointed in the above-captioned cases (the “Committee”), the United States Trustee for the District of Delaware (the “U.S. Trustee”), and Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company and The Financial Times Ltd (collectively, the “Media Intervenors” and, together with the Debtors, the Committee and the U.S. Trustee, the “Parties”).

WHEREAS, on November 23, 2023, the Court entered the *Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on an Interim Basis and (III) Granting Certain Related Relief* [D.I. 157] (the “Interim Order”);

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

WHEREAS, on January 11, 2023, the Court entered the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief* [D.I. 545] (the “Final Order”);

WHEREAS, on June 15, 2023, the Court entered the *Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1643] (the “First Extension Order”);

WHEREAS, on June 23, 2023, the Media Intervenors filed a notice of appeal regarding the First Extension Order [D.I. 1690];

WHEREAS, on October 24, 2023, the Court entered the *Second Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 3353] (the “Second Extension Order” and, together with the Interim Order, Final Order and First Extension Order, the “Prior Orders”);

WHEREAS, on each of January 11, 2023, June 8, 2023, June 9, 2023 and October 24, 2023 (collectively, the “Prior Hearings”), the Court held an evidentiary hearing during which the Debtors and/or the Committee, as applicable, presented evidence on which the Court relied to enter the Prior Orders;

WHEREAS, at the October 24, 2023 hearing, in connection with granting the Second Extension Order, the Court requested that the Parties find “some way to avoid another one of these hearings in 90 days where we don’t have to go through and hear the same testimony again” (Oct. 24, 2023 Hr’g Tr. 59:16-18);

WHEREAS, the Media Intervenors' appeal of the First Extension order is currently pending before the United States District Court for the District of Delaware, Civil Action No. 23-682-CFC (the "Appeal");

WHEREAS, on January 22, 2024, the Debtors filed the *Third Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 6153], seeking entry of the *Third Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the "Third Extension Order");

WHEREAS, the Parties engaged in good faith discussions to comply with the Court's directive and agreed to the *Stipulation Regarding the Third Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 7305] on the terms set forth therein;

WHEREAS, on February 13, 2024, the Court entered the Third Extension Order [D.I. 7315], which set the Extended Redaction Deadline of May 13, 2024;

WHEREAS, on May 13, 2024, the Debtors filed the *Fourth Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 14727] (the "Fourth Extension Motion"), seeking entry of the *Fourth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the "Fourth Extension Order");

WHEREAS, the U.S. Trustee and the Media Intervenors have advised they oppose the relief requested in the Fourth Extension Motion;

WHEREAS, it is the intention of the Parties to continue to comply with the Court's directive without prejudice to any of the Parties' rights, claims, arguments, and defenses in this matter and in the Appeal; and

WHEREAS, the Parties engaged in further good faith discussions to comply with the Court's directive;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and among the undersigned counsel for the Parties as follows:

1. To avoid the need for an additional evidentiary hearing, and in light of the Court's directive to the Parties at the October 24, 2023 hearing, the Parties agree that the Court may rule on the Fourth Extension Motion based on the existing record of the Prior Hearings and the pleadings filed to date.

2. All Parties' rights are reserved in the event that the Court declines to enter the Fourth Extension Order based on the existing record of the Prior Hearings, including specifically the Debtors' and the Committee's right to offer witness testimony and other evidence in support of the Fourth Extension Motion, and the U.S. Trustee's and the Media Intervenors' right to contest such evidence and offer argument opposing such an extension.

3. All Parties' rights are reserved in the event that the Court enters the Fourth Extension Order based on the existing record of the Prior Hearings, including the Media Intervenors' rights and arguments with respect to their Appeal.

4. All Parties' rights, claims and defenses with respect to any requests for further extensions of the redaction deadline are reserved.

5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Fourth Extension Motion, except for those matters, claims,

rights, or disputes for which the United States District Court for the District of Delaware currently has jurisdiction pursuant to Media Intervenors' Appeal.

May 29, 2024

LANDIS RATH & COBB LLP

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
Email: landis@lrclaw.com
brown@lrclaw.com
pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*)
James L. Bromley (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Alexa J. Kranzley (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
Email: dietdericha@sullcrom.com
bromleyj@sullcrom.com
gluecksteinb@sullcrom.com
kranzleya@sullcrom.com

Counsel for the Debtors and Debtors-in-Possession

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Robert F. Poppiti, Jr.

Matthew B. Lunn (No. 4119)
Robert F. Poppiti, Jr. (No. 5052)
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: mlunn@ycst.com
rpoppiti@ycst.com

-and-

PAUL HASTINGS LLP

Kristopher M. Hansen*
Kenneth Pasquale*
Gabriel E. Sasson*
Isaac S. Sasson*
John F. Iaffaldano*
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6000
Facsimile: (212) 319-4090

Email: krishansen@paulhastings.com
kenpasquale@paulhastings.com
gabesasson@paulhastings.com
isaacsasson@paulhastings.com
jackiaffaldano@paulhastings.com

**Admitted pro hac vice*

Counsel to the Official Committee of Unsecured Creditors

**ANDREW R. VARA, UNITED STATES
TRUSTEE, REGIONS 3 AND 9**

/s/ Linda Richenderfer

Linda Richenderfer (DE # 4138)
Trial Attorney
United States Department of Justice
Office of the United States Trustee
J. Caleb Boggs Federal Building
844 N. King Street, Room 2207, Lockbox 35
Wilmington, DE 19801
(302) 573-6491 (Phone)
(302) 573-6497 (Fax)
linda.richenderfer@usdoj.gov

/s/ David L. Finger

David L. Finger (ID #2556)
FINGER & SLANINA, LLC
One Commerce Center
1201 N. Orange St., 7th fl.
Wilmington, DE 19801
(302) 573-2525
dfinger@delawgroup.com

Katie Townsend (pro hac vice)
**THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS**
1156 15th Street NW, Suite 1020
Washington, DC 20005
202.795.9300
ktownsend@rcfp.org

Counsel for Media Intervenors